

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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In re	)	Chapter 11
	)	
TELEGLOBE COMMUNICATIONS CORPORATION, <i>et al.</i> ,	)	Jointly Administered
	)	Bankr. Case No. 02-11518 (MFW)
Debtors.	)	
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TELEGLOBE COMMUNICATIONS CORPORATION, <i>et al.</i> ,	)	
	)	C.A. No. 04-CV-1266 (SLR)
Plaintiffs,	)	<b>REDACTED - PUBLIC VERSION</b>
	)	
v.	)	
	)	
BCE INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	
-----	x	

**TRANSMITTAL AFFIDAVIT OF GREGORY E. STUHLMAN IN  
SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' OBJECTIONS TO THE  
SPECIAL MASTER'S FINAL DECISION**

I, Gregory E. Stuhlman, after being duly sworn upon oath, depose and state as follows:

I am an attorney with the law firm of Richards, Layton & Finger, counsel representing Plaintiffs in the above-captioned action.

I am admitted to practice before this Court.

This Affidavit is submitted in support of Plaintiffs' Response to Defendants' Objections to the Special Master's Final Decision.

1. Attached to this Affidavit as **Exhibit 1A** is a true and correct copy of a an email from M. Lalande, dated January 21, 2002.

2. Attached to this Affidavit as **Exhibit 1B** is a true and correct copy of a memorandum from I. Ricciuto, dated April 9, 2002.

3. Attached to this Affidavit as Exhibit 1C is a true and correct copy of a memorandum from M. Ryan, dated April 11, 2002.

4. Attached to this Affidavit as Exhibit 1D is a true and correct copy of a memorandum from I. Ricciuto, dated April 11, 2002.

5. Attached to this Affidavit as Exhibit 1E is a true and correct copy of an email from M. Turcotte, dated April 11, 2002.

6. Attached to this Affidavit as Exhibit 1F is a true and correct copy of an email from V. Mercier, dated April 12, 2002.

7. Attached to this Affidavit as Exhibit 1G is a true and correct copy of an email from M. Turcotte, dated April 14, 2002.

8. Attached to this Affidavit as Exhibit 1H is a true and correct copy of an email from G. Bauer, dated April 16, 2002.

9. Attached to this Affidavit as Exhibit 1I is a true and correct copy of an email from M. Lalande, dated April 16, 2002.

10. Attached to this Affidavit as Exhibit 1J is a true and correct copy of a presentation, titled 'Preliminary Discussion Materials, Project X,' dated April 16, 2002.

11. Attached to this Affidavit as Exhibit 1K is a true and correct copy of an email from M. Lalande, dated April 17, 2002.

12. Attached to this Affidavit as Exhibit 1L is a true and correct copy of an email from M. Turcotte, dated April 17, 2002.

13. Attached to this Affidavit as Exhibit 2 is a true and correct copy of a letter from A. Quintal, attaching Defendants' Privilege Logs, dated April 27, 2004.

14. Attached to this Affidavit as Exhibit 3 is a true and correct copy of a letter from D. Schimmel, attaching Defendants' Privilege Logs, dated April 16, 2004.

15. Attached to this Affidavit as Exhibit 4 is a true and correct copy of Opposition to Motion of the Official Committee of Unsecured Creditors for an Order Authorizing and Compelling Discovery Pursuant to Bankruptcy Rule 2004, dated April 21, 2004.

16. Attached to this Affidavit as Exhibit 5 is a true and correct copy of The Form of Plan Administration Agreement, dated February 2005.

17. Attached to this Affidavit as Exhibit 6 is a true and correct copy of The Sanction Order in the Ontario Superior Court, dated February 8, 2005.

18. Attached to this Affidavit as Exhibit 7 is a true and correct copy of The Order Confirming First Amended Joint Chapter 11 Plan of Liquidation of Teleglobe Holdings (U.S.) Corporation, Teleglobe USA Inc. and Certain of Their Debtor Affiliates, dated February 10, 2005.

19. Attached to this Affidavit as Exhibit 8 is a true and correct copy of The Statement of Claim in the Ontario Superior Court, dated November 16, 2005.

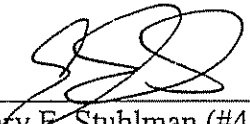
20. Attached to this Affidavit as Exhibit 9 is a true and correct copy of *McRae v. Canada (Attorney General)*, [1997] 46 B.C.L.R. (3d) 137.

21. Attached to this Affidavit as Exhibit 10 is a true and correct copy of *Divinsky, et al. v. Bethania*, [2002] 169 Man.R. (2d) 215.

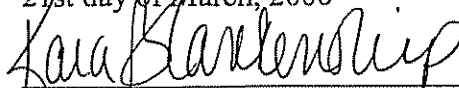
22. Attached to this Affidavit as Exhibit 11 is a true and correct copy of *In re Teleglobe Inc.*, [2004] O.J. No. 2905.

23. Attached to this Affidavit as Exhibit 12 is a true and correct copy of excerpts of the deposition of J. Monty, taken October 24, 2005.

Dated: March 21, 2006

  
\_\_\_\_\_  
Gregory E. Stuhlman (#4765)

SUBSCRIBED and sworn to before me this  
21st day of March, 2006

  
\_\_\_\_\_  
Notary Public

KARA J. BLANKENSHIP  
NOTARY PUBLIC  
STATE OF DELAWARE  
My Commission Expires May 9, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2006, I hand delivered and electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing(s) to the following:

Pauline K. Morgan, Esq.  
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I hereby certify that on March 28, 2006, I have sent by Federal Express the foregoing document to the following non-registered participants:

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